

# Exhibit K

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 1:23CV00878-TDS-JEP

DEMOCRACY NORTH CAROLINA; )  
NORTH CAROLINA BLACK ALLIANCE; )  
LEAGUE OF WOMEN VOTERS OF )  
NORTH CAROLINA, )  
 )  
Plaintiffs, )  
v. )  
 )  
ALAN HIRSCH, in his official )  
capacity as CHAIR OF THE STATE )  
BOARD OF ELECTIONS; JEFF CARMON III, )  
in his official capacity as )  
SECRETARY OF THE STATE BOARD OF )  
ELECTIONS; STACY EGGERS IV, in his )  
official capacity as MEMBER OF THE )  
STATE BOARD OF ELECTIONS; SIOBHAN )  
O'DUFFY MILLEN, in her official )  
capacity as MEMBER OF THE STATE )  
BOARD OF ELECTIONS; KAREN BRINSON )  
BELL, in her official capacity as )  
EXECUTIVE DIRECTOR OF THE STATE )  
BOARD OF ELECTIONS; NORTH CAROLINA )  
STATE BOARD OF ELECTIONS, )  
 )  
Defendants. )  
 )

DEPOSITION  
OF  
ANDREW JOHN TAYLOR

On Friday, March 28, 2025, commencing at 10:03 a.m., the deposition of ANDREW JOHN TAYLOR, was taken on behalf of the Plaintiffs at Nelson Mullins, 301 Hillsborough St., Suite 1400, Raleigh, North Carolina 27603, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, before Cynthia S. Boyd, RPR, and Notary Public in and for the State of North Carolina.

## A P P E A R A N C E S

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1 MR. LOPERFIDO: Good with everybody if  
2 we take a quick break?

3 (Recess taken.)

4 BY MR. LOPERFIDO:

5 Q. Welcome back, everybody. As I noted  
6 before the break, we're going to dive into section  
7 III, which is "Response to, 'Young People  
8 Constitute a Clearly Identifiable Class of Voter'."

9 Dr. Taylor, correct me if I don't get this  
10 quite right but it seems to be you're making two  
11 primary points in this section; the first being  
12 that there is no non arbitrary way to define young  
13 voters and, No. 2, that young voters, however you  
14 define them, don't have a distinct identity. Is  
15 that a fair characterization?

16 A. Yes.

17 Q. Okay. I'm going to talk about each in  
18 turn. As to the first one, you're not offering an  
19 opinion on what the correct age range is for young  
20 voters, right?

21 A. Only to the extent that I think 18 is the  
22 bottom, I think most people would agree, is the  
23 bottom or the minimum of that category. But, yes,  
24 that's correct.

25 Q. And that's because that is the age

1 necessary to vote in the United States?

2 A. Correct.

3 Q. And North Carolina?

4 A. Correct.

5 Q. Do you have an opinion on what the upper  
6 range should be to properly capture young voters?

7 A. No.

8 Q. And we just answered this but you agree  
9 that the age range identified by plaintiffs are an  
10 age range of individuals eligible to vote in North  
11 Carolina elections?

12 A. Yes.

13 Q. Now, on page 5 of your report, you  
14 identify commercial surveys, academic researchers,  
15 and other sources that have talked about the issue  
16 of young voters and used different age ranges. Is  
17 that a fair summary?

18 A. Yes.

19 Q. None of these resources cited  
20 unequivocally state that 18- to 25-year-olds are  
21 not young voters, right?

22 A. Correct.

23 Q. Several of them identify an 18 to 29  
24 range?

25 A. Yes.

1 Q. And you would agree that plaintiffs' 18 to  
2 25 range is encompassed in that range?

3 A. Yes.

4 Q. Do you know that the census breaks down  
5 data by 18 to 24?

6 A. Yes.

7 Q. And that covers nearly the entirety of  
8 plaintiffs' range as well?

9 A. Yes.

10 Q. I'm going to butcher these names but the  
11 academic researchers Holbein, H-o-l-b-e-i-n, and  
12 Hillygus --

13 A. Holbein and Hillygus.

14 Q. H-i-l-l-y-g-u-s. They define young voters  
15 at 18 to 29, right?

16 A. Yes.

17 Q. You note that there. Would you say that  
18 stopping at 29 is an arbitrary decision by them?

19 A. Yes.

20 Q. Is there an upper range that you could  
21 provide as non arbitrary?

22 A. As non arbitrary? No.

23 Q. Is a 40-year-old a young voter?

24 A. Getting towards the end that I think you  
25 could reasonably claim they were a young voter.

1 Q. Yeah. Where do we start hitting the point  
2 in the age ranges where you can -- strike that.  
3 Let me ask that a different way.

4 A. If you are interested in having or doing  
5 an analysis where -- of voting behavior by age and  
6 you wanted relatively even sized groups hereby in  
7 terms of population, I think if you -- well,  
8 depending on how many groups you wanted, I suppose.  
9 But two groups is just too blunt of an instrument.  
10 Maybe you want at least three or four. You know,  
11 if you go to 40 and you want four relatively  
12 comparably sized groups of voters, I think you're  
13 going probably a bit too far. But, again, it  
14 depends on the type of analysis you want to do.

15 Q. Are you aware that the North Carolina  
16 State Board of Elections' election and registration  
17 data categorizes people into four age groups with  
18 the youngest being 18 to 25?

19 A. Not off the top of my head but, yes, I'll  
20 take your word for it.

21 Q. Does that change your view at all on  
22 whether 18 to 25 is an arbitrary designation?

23 A. No.

24 Q. And you're not saying that 18- to  
25 25-year-old voters are not young voters?

1 A. No. I'm not saying that.

2 Q. And what I was trying to ask before and  
3 didn't quite get it out, is there a line that you  
4 would point to between a young voter and someone  
5 who is not a young voter?

6 A. I think we just -- no. There isn't a  
7 clear line. But obviously the older you get, the  
8 stronger the argument you need to make to include a  
9 person of that age in the category of young voter.

10 Q. Does life expectancy matter to figuring  
11 out where that line is?

12 A. No. I don't think so. You would think in  
13 terms of other metrics to categorize your voter  
14 such as perhaps health, in addition to age.

15 Q. If someone were trying to assess voting  
16 patterns for all voters, would they have the same  
17 challenge in terms of arbitrariness or do you see  
18 that differently?

19 A. No, they would. In fact, they would have  
20 a problem with the upper end as well as the lower  
21 end. Whereas we don't really have the challenge  
22 with the lower end when we're categorizing young  
23 voters. The only thing I would say about that when  
24 you asked me about the age 18 to 25, I agree you  
25 could make a strong argument that they are young



1 voters even though, as I've said, this is very  
2 arbitrary. The one thing I do write in the report  
3 is -- and this is not synonymous. But certainly  
4 sometimes I think people consider when they say  
5 young voters, they're really talking about maybe  
6 first-time voters. Of course you could be pretty  
7 old and a first-time voter. And if you do vote  
8 habitually, you're really in your first election by  
9 the time you're 21, 22, if we're just using  
10 presidential races, and that might be a way to do  
11 it. But of course that would be lower than the 25  
12 bar. It would be 18s to 21s or 18s to 22s.

13 Q. Would you dispute that evidence relating  
14 to the experience of 18- to 25-year-olds is  
15 evidence relating to young voters?

16 A. If the experience has to do with voting  
17 specifically, then I think you can make a case that  
18 this is an experience that -- if you're between 18  
19 to 25 and it has to do with you voting, I think you  
20 can make a very strong case this has something to  
21 do with a young voter, yes.

22 Q. And if a law discriminates against a  
23 subset of young voters, however defined, but not  
24 all of them, would it be incorrect to say that the  
25 law discriminates against young voters?